

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE AMERICAN INTERNATIONAL GROUP, : No. 08 CV 4772 (LTS) (DCF)
INC. 2008 SECURITIES LITIGATION :
: CONFIDENTIAL
: FILED UNDER SEAL
: ORAL ARGUMENT REQUESTED
: EVIDENTIARY HEARING
: REQUESTED

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**NOTICE OF AIG'S MOTION TO EXCLUDE
THE DECLARATIONS, TESTIMONY AND OPINIONS OF
LEAD PLAINTIFF'S EXPERT DR. STEVEN P. FEINSTEIN**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law and declaration of Joseph S. Allerhand, Defendant American International Group, Inc. ("AIG") will move this Court, before the Honorable Laura T. Swain, United States District Judge, United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Room 755, New York, New York 10007, on a date and at a time to be set by the Court, for an order pursuant to Rules 403 and 702 of the Federal Rules of Evidence excluding (i) the Declaration of Steven P. Feinstein dated April 1, 2011 ("Feinstein Declaration") and the Reply Declaration of Steven P. Feinstein dated December 16, 2011 ("Feinstein Reply Declaration") (collectively the "Feinstein Declarations"), (ii) Dr. Feinstein's testimony on the subjects addressed in the Feinstein Declarations, and (iii) all evidence that is based upon, or directly or indirectly references the Feinstein Declarations or Dr. Feinstein's testimony or the subjects addressed in the Feinstein Declarations and Dr. Feinstein's testimony.

The undersigned counsel certifies, pursuant to Rule 2(B) of Judge Swain's Individual Practices Rules, that AIG used its best efforts to resolve informally the matters raised in this submission. These efforts were unsuccessful. Further, Lead Plaintiff has informed AIG's counsel that it reserves the right to object to the motion.

Dated: New York, New York
May 24, 2012

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By: /s/ Joseph S. Allerhand

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